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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,
13
14 Plaintiff,

15 vs.

16 SYLVIANE WHITMORE,
17 LARRY MCDANIEL,
18 Defendants.

Case No.: 2:17-cr-110 APG-DJA

**STIPULATION TO EXTEND
DEADLINES; PROPOSED ORDER**

19
20 The parties, Sylviane Whitmore, by and through her counsel, Lisa A. Rasmussen,
21 Larry McDaniel, by and through his counsel, Daniel Hill, and the United States, by and
22 through its counsel, Assistant United States Attorney Richard Anthony Lopez, hereby
23 stipulate as follows:

- 24 1. Presently, the supplemental briefing on McDaniel and Whitmore's Motions
25 for New Trial are currently due today, February 17, 2022. ECF 259.

2. Defense counsel need additional time to prepare the supplements because they have requested that two subpoenas be issued per a sealed Rule 17 filing. ECF 263.
3. In consultation with the government, Defendants propose the following extensions of time:
 - a. Whitmore and McDaniel's supplement's due on March 10, 2022;
 - b. Government's Response due on April 11, 2022;
 - c. Whitmore and McDaniel's Replies due on April 25, 2022.
4. The government agrees to these extended dates but does not waive any rights to object to any procedural infirmities nor does this stipulation confer any statutory extensions upon the defendants unless the court finds cause for the same, which has yet to be determined.
5. The government's forfeiture motion, ECF 232, would continue to be held in abeyance and the sentencing hearings set for April 21, 2022 will later be adjusted by separate stipulation.
6. Denial of this request would cause prejudice to the Defendants Whitmore and McDaniel and this request for an extension of time is not made for the purpose of delay.

Dated this 17th day of February 2022.

The Law Offices of Kristina Wildeveld & Associates,

/s/ Lisa A. Rasmussen

LISA A. RASMUSSEN, ESQ.
Counsel for Sylviane Whitmore

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1 **Hill Law Firm,**

2 */s/ Daniel Hill*

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4 DANIEL HILL, ESQ.
5 Counsel for Larry McDaniel

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7 **CHRISTOPHER CHIOU,**
8 **Acting United States Attorney**
9 **District of Nevada**

10 */s/ Richard Anthony Lopez*

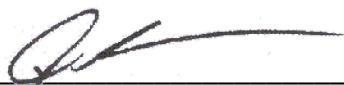
11 _____
12 BY: RICHARD ANTHONY LOPEZ
13 Assistant United States Attorney

14
15 **ORDER**

16 Pursuant to the Stipulation of the parties, and good cause appearing,
17 IT IS HEREBY ORDERED that the briefing schedule set on October 5, 2021 is
18 hereby extended as follows:

- 19 a. Whitmore and McDaniel's supplement's due on March 10, 2022;
20 b. Government's Response due on April 11, 2022;
21 c. Whitmore and McDaniel's Replies due on April 25, 2022.

22 Dated: February 21, 2022

23
24 
25 _____
26 The Honorable Andrew P. Gordon
27 United States District Judge